

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FCS ADVISORS, LLC,

Plaintiff,

—against—

21 Civ. 6995 (PKC)

THEIA GROUP, INC., d/b/a “THORIAN
GROUP” and/or “CYPHERIAN”; THEIA
AVIATION, LLC; and THEIA HOLDINGS
A, INC., d/b/a “THORIAN HOLDINGS,”

Defendants.

DECLARATION OF KEVIN J. O’BRIEN

KEVIN J. O’BRIEN hereby declares pursuant to 28 U.S.C. § 1746:

1. I am an attorney with the law firm of King & Spalding LLP and an attorney of record for Michael Fuqua (the “Receiver”) in the above-captioned action. I am a member in good standing of the bar of the State of New York and am admitted to practice before this Court.

2. Attached hereto as Exhibit A is a true and correct copy of a demand letter that counsel for the Receiver sent on July 3, 2025 to LTS Systems, LLC, the Buyer in the court-approved sale described in the motion accompanying this Declaration.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on July 21, 2025

/s/ Kevin J. O’Brien

Kevin J. O’Brien